Thanks to the FCC for this balanced NPRM that is sensitive to the concerns of licensed users of the HF spectrum. HF radio is a precious natural resource. Despite advances in technology, HF radio is still the only means of communicating long distances with no infrastructure. During major disasters, HF continues to play a strong role as a back-up communications method. Since long distance signals are often very weak, amateurs and other HF users utilize sensitive receivers and high-gain antennas. Even low levels of interference on these frequencies can severely hamper HF operation. The FCC recognizes that it will be particularly challenging to deploy BPL systems that do not interfere with amateur radio operations. This risk of interference would be reduced if the FCC required that BPL systems avoid the amateur HF bands by using deep notch filters or dropping carriers within the ham bands. The amateur HF bands occupy 3.7MHz, or less than 14% of the entire HF spectrum. It's reasonable to assume that a BPL system could avoid the amateur bands without significant impact on data throughput.

Based on the noise I've seen on two trial systems, the deployment of these systems will likely cause thousands of complaints of interference from licensed users. The FCC must be committed to strictly enforcing the Part 15 requirement that BPL installations do not create any interference to licensed users. This commitment will encourage utilities and BPL manufacturers to resolve complaints in a timely fashion.

The NPRM does not address the concerns expressed by ARRL that the field strength of BPL signals are likely higher above the power line than below. The FCC should require measurements to be taken above the power line at the height of a typical amateur radio tower (60-80ft) to determine if BPL systems are within Part 15 emission limits.

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